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USDOC FOR 532/OEA/LHINES/ADYSON  
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM ZARIT  
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A

TAGS: BMGT BEXP HK ETRD ETTC  
SUBJECT: EXTRANCHECK: PRE-LICENSE CHECK: REMARKABLE MASK TECHNOLOGY COMPANY

REF: A) USDOC 00635 B) D389165

¶1. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO), conducted a pre-license check at Remarkable Mask Technology Company, 7 Dai Shun Street, Tai Po Industrial Estate, Tai Po, N.T., Hong Kong (Remarkable Mask). The purpose of the visit was to determine the suitability of Remarkable Mask to be a recipient of two White Knight Atloo Pumps that are the subject of export license application D389165. The items (ECCN 2B350) are valued at USD \$15,340 and are controlled for chemical and biological weapons reasons (CB). The license applicant is Akrion Inc. of Allentown, Pennsylvania.

¶3. A Hong Kong Companies Registry check of Remarkable Mask reveals that the company is registered in 2003 in the Cayman Islands. Hong Kong residents Cao, Zhong, Chau, Chit and Leung, Shun San Tony are listed as directors as is Taiwan national Tzu, San Te and mainland Chinese national Wang, Ning. A review of the Remarkable Mask web site ([www.remarkable.com](http://www.remarkable.com)) reveals that the company was established with an initial investment of USD 60 million. Remarkable Mask's parent company, Shougang Concord Technology Holdings Limited was established in 1983 and is listed on the Hong Kong Stock Exchange. The company produces photomasks used in semiconductor production.

¶4. On February 5, 2008, the ECO, accompanied by Commercial Assistant, Carrie Chan, visited Remarkable Mask at the address listed above and met with Mr. Tom Chen, Procurement Manager. Mr. Chen provided a general overview of the company. He stated that the company's customers are foundries in mainland China, Malaysia, Taiwan and elsewhere in Asia. Customers include GSMC, HHNEC, ASMC, X-FAB and PSC.

¶5. As to the specific items in question, Mr. Chen stated that the pumps would be used in a cleaning tool used to clear masks after production. They will be used to replace existing pumps (there are four total on the cleaning tool). Chen stated that Remarkable Mask had already received three pumps (pursuant to license) and had ordered one additional pump. He provided, by subsequent e-mail, documentation concerning the three pumps already received.

¶6. Mr. Chen then provided the ECO with a tour of the clean room where the Akrion Gama Wet Cleaning Tool is located. ECO saw an Akrion cleaning unit as well as four pumps in operation on the unit.

¶7. The ECO found Mr. Chen's explanations credible and generally consistent with information independently obtained by the ECO. ECO recommends that OEA independently verify that the prior three units

already shipped to Remarkable Mask were all appropriately shipped under existing licenses.

Cunningham